Michael J. Lockerby (VSB No. 24003) Brittany J. Nelson (VSB No. 81734) Foley & Lardner LLP Washington Harbour 3000 K. Street NW, Suite 600 Washington, DC 20007 202-672-5300

Counsel for Karl Engelke

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	) Chapter 11
CIRCUIT CITY STORES, INC., et. al. Debtors.	) Case No. 08-35653 ) Jointly Administered

## MOTION FOR ALLISON DOUCETTE TO APPEAR PRO HAC VICE PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E) (2)

Brittany J. Nelson (the "Movant"), a member in good standing of the bar of, and admitted in, the Commonwealth of Virginia, and admitted to practice before, among other courts, the United States Bankruptcy Court for the Eastern District of Virginia (the "Court"), and an attorney with Foley & Lardner LLP, hereby moves this Court to enter an order authorizing Allison Doucette, an attorney with Anthony & Partners, LLC to appear *Pro Hac Vice* before this Court to represent Karl Engelke, pursuant to Local Bankruptcy Rule 2090-1(E) (2) (collectively, the "Motion"). In support of the Motion, the Movant states as Follows:

1. Pursuant to Local Bankruptcy Rule 2090-1(E)(2), "an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases upon motion of

a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar."

- 2. Ms. Doucette is an attorney in the firm of Anthony & Partners, LLC, which is located in Tampa, Florida. She is admitted, practicing, and in good standing as a member of the bar of the state of Florida and the District Courts for the Northern, Middle, and Southern Districts of Florida. There are no disciplinary proceedings pending against Ms. Doucette.
- 3. The Middle District of Florida, where Ms. Doucette has her offices, provides for pro hac vice admission.
- 4. Ms. Doucette's Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) is attached as **Exhibit A.**
- 5. The Movant requests that this Court grant the Motion so that Ms. Doucette may appear and be heard at hearings and other matters in this case.
- 6. Pursuant to Local Bankruptcy Rule 9013-1(E), and given the administrative nature of the relief requested herein, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

**Wherefore**, the Movant respectfully requests that this Court enter an order, substantially in the form attached hereto as **Exhibit B**, (i) authorizing to appear *pro hac vice* in association with the Movant as attorneys for Karl Englke in the above-captioned case and (ii) granting such other and further relief as is just and proper.

Dated: August 17, 2012 Respectfully Submitted,

/s/\_Brittany J. Nelson\_

Brittany J. Nelson (VSB No. 81734) Michael J. Lockerby (VSB No. 24003) Foley & Lardner LLP Washington Harbour 3000 K. Street NW, Suite 600 Washington, DC 20007

Telephone: 202-295-4732 Telecopier: 202-672-5399

Counsel for Karl Engelke

## Certificate of Service

I hereby certify under penalty of perjury that on August 17, 2012, a true and exact copy of the foregoing pleading was forwarded via ECF notification to all necessary parties as set forth in the Order Pursuant to Bankruptcy Code 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management, and Administrative Procedures.